

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. Nos. 29196, 29387, 30064 & 30158

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, counsel to the FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 435], entered January 9, 2023 (the “Interim Compensation Order”), the *Order (I) Appointing Fee Examiner and (II) Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of Expenses* [D.I. 834], entered March 8, 2023 (the “Fee Examiner Order”), and the *Findings of Fact, Conclusions of Law and Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates* [D.I. 26404], entered October 8, 2024, (the “Confirmation Order”), Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”) filed the *Final Fee Application of Quinn Emanuel Urquhart & Sullivan, LLP for Services Rendered and Reimbursement of Expenses for the Period From November 13, 2022*

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

Through and Including October 8, 2024 [D.I. 29196] (the “Final Fee Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. Pursuant to the notice attached to the Final Fee Application [D.I. 29196-1], objections to the Final Fee Application, if any, were to be filed and served no later than January 31, 2025 at 4:00 p.m. (ET) (the “Objection Deadline”).

3. On January 24, 2025, Lidia Favario (“Favario”) filed the *Objection to the Final Fee Application of Quinn Emanuel Urquhart & Sullivan, LLP for Services Rendered and Reimbursement of Expenses for the Period from November 13, 2022, Through and Including October 8, 2024* [D.I. 29387] (the “Objection”). Subsequently, on April 16, 2025, Favario filed a notice withdrawing the Objection [D.I. 30158].

4. Pursuant to the Fee Examiner Order, on March 4, 2025, Katherine Stadler, (the “Fee Examiner”) filed the *Fee Examiner’s Summary Report on Final Fee Applications* [D.I. 30064] (the “Fee Examiner Report”) with respect to the Final Fee Application, recommending the approval of the fees and expenses requested in the Final Fee Application with certain agreed-upon reductions.

5. The undersigned hereby certifies that the Court’s docket has been reviewed and no other answer, objection, or other responsive pleading to the Final Fee Application appears thereon.

6. A copy of the Proposed Order approving the Final Fee Application has been circulated to the Fee Examiner and the Office of the United States Trustee (together, the “Parties”). The Parties have advised that they do not object to entry of the Proposed Order.

7. In accordance with the Court’s electronic order processing procedures, a clean copy of the Proposed Order shall be uploaded to CM/ECF.

WHEREFORE the undersigned, on behalf of the FTX Recovery Trust, respectfully requests that the Proposed Order, substantially in the form attached hereto as **Exhibit A**, be entered at the Court's earliest convenience.

Dated: April 17, 2025
Wilmington, Delaware

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